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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROSALIO ANDRES SIGUENZA-
ROMERO, aka "Tweety,"

Defendant,

ZENITH FIREARMS, INC.,

Petitioner.

2:20-CR-156-RFB-DJA

**Second Stipulation Regarding ECF Docs.
404-406**

The United States of America and counsel for Zenith Firearms, Inc. (ZFI), Aaron D. Lovaas, Esq., agree as follows:

1. On June 2, 2023, Zenith Firearms, Inc. (ZFI) filed a Petition for Ancillary Hearing, ECF No. 404, Declaration of Kutlay Kaya, ECF No. 405, and Certificate of Service, ECF No. 406.

2. The United States has not filed a response, but is in contact with counsel for the Petitioner with the intent of negotiating a resolution without the need for the hearing.

3. Counsel for the Petitioner does not object to the United States filing a response at a later date, but counsel for the Petitioner and for the United States previously stipulated that the Petition shall be held in abeyance while the Petitioner and the United States negotiate in good faith. ECF No. 543.

4. On October 17, 2023, the Court ordered: "Counsel to file resolution or Status Report within 60 days." ECF No. 548 at 2.

5. At this time, the United States intends on requesting additional documentation from the Petitioner to support the claim.

6. This stipulation is not sought for purposes of delay. Undersigned government counsel has been attending to time-sensitive matters and intends to resolve this with Petitioner.

7. The parties are requesting another 90 days to resolve this matter.

8. If the negotiations do not result in a stipulated resolution, the United States and counsel for the Petitioner will inform the Court, and the United States will then file a response to the Petition.

Respectfully submitted this 15th day of December, 2023.

NEWMYER & DILLION LLP

JASON M. FRIERSON
United States Attorney

Aaron D. Lovaas
AARON D. LOVAAS, ESQ
Counsel for Zenith Firearms, Inc. on behalf of
ZENITH FIREARMS, INC.
Petitioner

Jacob H. Operskalski
JACOB H. OPERSKALSKI
Assistant United States Attorney

Stipulated Resolution, Status Report or Government Response is due on or before 3/18/2024.

IT IS SO ORDERED:



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED: December 18, 2024